



317116



February 10, 2008

Mr. Ross del Rosario
U. S. EPA - Region 5 (SR-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
Monthly Report January 1 – January 31, 2008**

Dear Mr. del Rosario:

Enclosed is the Sauget Sites Area I Monthly Report for the January 2008 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

Steven D. Smith
Project Coordinator

cc: Kevin Turner – USEPA
Tim Gouger - USACE
Sandra Bron - IEPA
Dave Webb - IDPH
Mike Coffey - USF&W
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski - Monsanto
Linda Tape - Husch & Eppenberger

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Status Report

Date of Report: February 10, 2008
Period Covered: January 1, 2008 - January 31, 2008

Work Performed during the Reporting Period

Samples in the utility corridors along Queeny Avenue between Sites H and I were obtained on June 7th, 2007 in accordance with the requirements of the Work Plan approved on March 22nd, 2007. Analytical results for these samples have been received and the data have been validated. The validated data were submitted to the Agency on January 3rd, 2008. A risk assessment described in Section 4 of the Work Plan was carried out in accordance with agreements reached during a teleconference on September 13th, 2007 with the Agencies. A revised version of Section 4 of the Work Plan incorporating the results of the discussions during the teleconference was submitted on November 27th, 2007. The results of the risk assessment were submitted on January 7th, 2008 and are currently being reviewed by the Agency.

A report presenting the results of the investigation to determine if cadmium leached from the creek bottom soils into the groundwater was submitted to the Agency on October 25th, 2007. The investigation established that the concentration of cadmium in the groundwater downstream of Dead Creek was well below the Illinois Class I groundwater standard, with the majority of the samples concentrations being less than 5 percent of that standard. Comments were received from the Agency on November 27th and a revised report that incorporates those comments was submitted on January 3, 2008. The revised report was approved on January 24, 2008.

The final Work Plan for the Soil Vapor Intrusion Investigation was approved on May 24th, 2007 and Agency comments on the investigation data report were also received on that same day. Responses to those comments are being prepared and will be submitted in February 2008. USEPA issued comments on a Technical Memorandum summarizing the results of a human health evaluation submitted to the Agency on March 19th, 2007. These comments are dated June 8th, 2007. However, they were not received at that time by the Project Coordinator and the comments were reissued on September 20th, 2007. A teleconference was held with the Agency and its oversight contractor, CH2M Hill, on October 23rd, 2007 and responses to those comments were submitted to the Agency on January 2, 2008. The human health evaluation was submitted on January 4, 2008.

A report summarizing the results of DNAPL recovery pumping tests at BR-I was submitted to the Agency on April 16, 2007. Comments on the report were received from the Agency on January 23, 2008. Those comments are being reviewed and responses will be submitted in February.

USEPA is also reviewing a Technical Memorandum documenting the derivation of risk-based concentrations used in the Dead Creek removal work and in the Dead Creek Ecological Risk Assessment submitted to the Agencies on July 27th, 2007.

The following items that were discussed during a May 24, 2007 teleconference with USEPA and CH2M Hill remain outstanding:

- The status of the Technical Memorandum presenting the results of the Human Health Risk Assessment for a residential child exposure in Dead Creek. This Tech Memo was submitted to the Agencies in April 2006.
- The status of the approval of the Tech Memo on Principal Threat Evaluation for Toxicity. This memo was initially submitted in January 2006. The Agency agrees that no Principal Threat materials were found in the Area 1 disposal sites.
- Agency comments on the proposed changes to the draft RI report.

Attachments

There are no Technical Memoranda or data submitted with this report.

Work Scheduled for Next Reporting Period

- Submit responses to the Agency comments on the Soil Vapor Intrusion Investigation data report.
- Submit responses to the Agency comments on the DNAPL recovery test report.